

**FILED**

JAN 25 2019

UNITED STATES DISTRICT COURT OF  
THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

CASE NO.2-18-CV-01207-CRE

DANA W.WILEY,  
PLAINTIFF

VS.

PRO'SE  
AMENDED COMPLAINT

WORLD WRESTLING ENTERTAINMENT CHAIRMAN  
CEO VINCE MCMAHON JOHN DUE  
D-GENERATION X AND NWO WRESTLING EMPLOYEE'S,  
DEFENDANT'S

PLAINTIFF, DANA W.WILEY COMPLAINT FOR (A) COPYRIGHT INFRINGEMENT VIOLATION  
(B) BREACH OF COPYRIGHT CONTRACT AND  
(C) FAILURE TO ROYALTY PAY DANA W.WILEY HERE AFTER PROMOTEING DISTRIBUTION AND MARKET  
Selling HIS BRAND TRADEMARK NAME D-GENERATION X NWO T-SHIRT'S AT THESE  
LIVE TELEVISED EVENT'S MONDAY NIGHT RAW, SMACKDOWNLIVE, MONDAY NITRO AND ON THEIR  
WEBSITE WWE SHOP.COM PURSUANT TO PROVISION OF 15 U.S.C 1114 U.S.C 1125(A)  
F.S.A 501 AND 17 U.S.C 1004/17 U.S.C 114(G)2) UNDER 261.3

#### 1. INTRODUCTION

THIS MATTER CONCERN'S THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO VINCE  
MCMAHON JOHN DUE D-GENERATION X NWO WRESTLING EMPLOYEE'S COMMITTING AN COPYRIGHT  
INFRINGEMENT VIOLATION HERE FOR THE FAILURE TO ROYALTY PAY DANA W.WILEY HERE AFTER  
PROMOTEING DISTRIBUTION AND MARKET SELLING HIS BRAND TRADEMARK NAME D-GENERATION X  
NWO T-SHIRT'S AT THESE LIVE PASS UPCOMING TELEVISED SHOW'S MONAY NIGHT  
RAW, SMACKDOWNLIVE, MONDAY NITRO AND ON THEIR WEBSITE WWE SHOP.COM SENSE DEBUTING  
JULY 7, 1996/AUGUST 10, 1997 AND UPCOMING PRESENT SCHEDULE REUNION TELEVISED SHOW'S ON  
ABOVE DATE'S OF JANUARY 14TH, UP UNTIL SEPTEMBER 2, 2019

#### 2. INTRODUCTION

DANA W.WILEY BRINGS THIS ACTION AGAINST THE DEFENDANTS WORLD WRESTLING  
ENETERTAINMENT CEO VINCE MCMAHON JOHN DUE D-GENERATION X NWO WRESTLING EMPLOYEE'S  
PURSUANT TO THE PROVISION 15 U.S.C 1114  
15 U.S.C 1125(A) F.S.A 501 AND 17 U.S.C 1004/17 U.S.C 114(G)2) UNDER 261.3 IN  
ACCORDANCE TO SECURE RELIEF UNDER THE  
UNITED STATES FEDERAL AND PENNSYLVANIA U.S CONSTITUTION LAW. PURSUE 15 U.S.C  
1114-1118  
HERE FOR THE DEFENDANT'S (A) BREACH OF CONTRACT (B) FAILURE TO RELEASE AN  
COPY OF THE COPYRIGHT CONTRACT THE DEFENDANT'S HAD PLAINTIFF, DANA WILEY SIGN  
BACK IN AUGUST 21, 1995 HERE FOR HIS BRAND TRADEMARK NAME D-GENERATION X  
NWO T-SHIRTS AND OTHER MERCHANDISE THESE DEFENDANT'S HAS USED PLAINTIFF BRAND  
TRADEMARK NAME ON SENSE DEBUTING JULY 07, 1996/AUGUST 10, 1997 AND UPCOMING  
PRESENT LIVE TELEVISED SCHEDULE REUNION SHOW'S ON MONADY NIGHT RAW, SMACKDOWNLIVE  
BEING BROADCASTED LIVE ON JANUARY 14TH UP UNTIL SEPTEMBER  
02, 2019 AND (C) THE DEFENDANT'S FAILURE TO ROYALTY PAY PLAINTIFF, DANA WILEY  
THE \$75-MILLION FOR HIS BRAND TRADEMARK NAME D-GENERATION X AND NWO T-SHIRT'S  
THAT THE DEFENDANT'S HAVE BEEN PROMOTING DISTRIBUTING/MARKET SELLING ON THERE  
WEBSITE WWE SHOP.COM

#### II. PARTIES

1. PLAINTIFF, DANA W.WILEY IS A PUBLIC RESIDENCE OF THE UNITED STATES AND THE  
LAWS OF THE STATE OF PENNSYLVANIA AT: 531 CASE STREET APT-9  
ROCHESTER, PA 15074  
CELL PHONE NUMBER 724/558/7679

AMENDED

PLAINTIFF, DANA W.WILEY IS ALL SO IN GOOD STANDARDS WITH THE FEDERAL AND STATE PENNSYLVANIA LAWS. HE HAS ALL SO EXHAUSTED ALL FEDERAL AND STATE REMEDIES AND HAS DONE EVERYTHING IN TRYING TO SOLVE THIS MATTER WITH THE DEFENDANTS WORLD WRESTLING ENTERTAINMENT CHAIRMEN CEO VINCE MCMAHON JOHN DUE D-GENERATION X NWO WRESTLING EMPLOYEE'S THEIRFORTH BRING'S THIS AMENDED PRO'SE COMPLAINT PURSUANT TO THE SCREENING PROVISIONS OF 28 U.S.C 1331-1338(B) AND 28 U.S.C 1915(E)(2).

2.THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO' VINCE MCMAHON JOHN DUE D-GENERATION X AND NWO WRESTLING EMPLOYEE'S.  
HEREBY HAS JURISDICTION OF THE BRAND TRADEMARK NAME D-GENERATION X NWO COPYRIGHT CONTRACT THEY HAD PLAINTIFF,DANA W.WILEY SIGN BACK IN AUGUST 21,1995 FOR SUM AMOUNT OF \$75-MILLION AND EXHIBIT(A) PAGE 1-6 CEASE AND DESIST LETTER THAT PLAINTIFF, DANA W.WILEY SUBMITTED BACK HERE TO THE DEFENDANT'S ON JULY 12,2018 THESE DEFENDANT'S ARE LOCATED AT:1241 EAST MAIN STREET STAMFORD, CT 06902

III.JURISDICTION AND VENUE

1.THIS COURT HAS ORIGINAL JURISDICTION UNDER THE 5TH AMENDMENT AND PROVISION PURSUANT TO 15 U.S.C 1121(A) 15 U.S.C 1051-1127 AND 28 U.S.C 1331-1338 ACTION ARISING (FEDERAL AND STATE QUESTION UNDER THE BRAND AND TRADEMARK LAW'S OF THE U.S CONSTITUTION.

2.THIS COURT HAS JURISDICTION PURSUANT 28 U.S.C 1331-1338 AND PROVISION UNDER THE 5TH AMENDMENT IN ACCORDANCE WITH THE PRINCIPLES OF PENDANT JURISDICTION IN THE SAID CLAIM'S JOINED WITH SUBSTANTIAL AND RELATED CLAIM'S UNDER THE BRAND NAME/TRADEMARK LAW'S OF THE U.S CONSTITUTION 15 U.S.C 1051-1127.

STATEMENT OF FACTS

1.THE DEFENDANT'S CEO" VINCE MCMAHON JOHN DUE D-GENERATION X AND NWO WRESTLING EMPLOYEE'S AGREED TO COPYRIGHT CONTRACT WITH PLAINTIFF,DANA W.WILEY FOR HIS BRAND TRADEMARK NAME D-GENERATION X NWO T-SHIRT'S AND OTHER MERCHANDISE ON AUGUST 21,1995 FOR SUM AMOUNT \$75-MILLION.

2.THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO"VINCE MCMAHON JOHN DUE WRESTLING EMPLOYEE'S ON July 07,1996/AUGUST 10,1997 AND PRESENT UPCOMING SCHEDULE TELEVISED REUNION SHOW'S AS OF JANUARY 14TH UP UNTIL SETEMBER 02,2019 BETWEEN THE HOUR 8/11 P.M AND 8/10 P.M ON THESE NETWORK'S USA,WWE AND USE BE TNT STARTED AND HAS BEEN PROMOTING DISTRIBUTING MARKET SELLING PLAINTIFF,DANA W.WILEY BRAND TRADEMARK NAME D-GENERATION X NWO T-SHIRT'S AND OTHER MERCHANDISE AT THESE LIVE TELEVISED PASSED AND UPCOMING SCHEDULE SHOW'S MONDAY NIGHT RAW,SMACKDOWNLIVE, MONDAY NITRO AND ON THERE WEBSITE WWE SHOP.COM.

3.PLAINTIFF,DANA W.WILEY HAS FAILED THE ATTACH EXHIBIT(A) PAGE 1-6 CEASE AND DESIST LETTER HERE TO THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO VINCE MCMAHON JOHN DUE D-GENERATION X NWO WRESTLING EMPLOYEE'S ON JULY 12,2018 AND SEVERAL TIME'S WHOLE INCARCERATED IN THE STATE PENNSYLVANIA DEPARTMENT OF CORRECTION HEREBY SEEKING THE FOLLOWING RELIEF;  
(A)FOR THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO VINCE MCMAHON JOHN DUE WRESTLING EMPLOYEE'S TO RELEASE A COPY OF THE CONTRACT PLAINTIFF,DANA W.WILEY SIGN BY THE DEFENDANT'S ON AUGUST 21,1995 FOR SUM AMOUNT \$75-MILLION.

AMENDMENT

AND(B)FOR THE DEFENDANT'S TO ROYALTY PAY PLAINTIFF,DANA W.WILEY \$75-MILLION HERE FOR HIS BRAND TRADEMARK NAME D-GENERATION X NWO T-SHIRT'S AND OTHER MERCHANDISE THESE DEFENDANT'S HAS BEEN PROMOTING/DISTRIBUTING MARKET SELLING OFF THERE WEBSITE WWE SHOP.COM AND LIVE TELEVISED SHOW'S BEING BROADCASTED ON USA NETWORK AT HOUR OF 8 P.M EVERY MONDAY/TUESDAY NIGHT.

4.THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO VINCE MCMAHON JOHN DUE D-GENERATION X NWO WRESTLING EMPLOYEE'S HAS SHOWED NO ATTEMPT.(A)RELEASE A COPY OF COPYRIGHT CONTRACT THEY HAVE WITH PLAINTIFF,DANA W.WILEY AND (B)ROYALTY PAY PLAINTIFF,DANA W.WILEY THE \$75-MILLION FOR HIS BRAND TRADEMARK NAME D-GENERATION X NWO MERCHANDISE SENSE BEING SERVED THE ATTACH EXHIBIT(A) PAGE 1-6 CEASE DESIST LETTER ON JULY 12,2018.

5.THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO VINCE MCMAHON JOHN DUE WRESTLING EMPLOYEE'S ON JANUARY 14TH,15TH AND UPCOMING REUNION SCHEDULE SHOW'S TO BE TELEVISED LIVE EVERY MONDAY/TUEDAY AT 8 P.M ON USA NETWORK UP UNTIL SEPTEMBER 2,2019 HAS CONTINUOUSLY AND ARE PLAINING TO PROMOTED DISTRIBUTED AND MARKET SAIL PLAINTIFF,DANA W.WILEY BRAND TRADEMARK NAME D-GERENERATION X NWO MERCHANDISE OFF THERE WEBSIE WWE SHOP.COM AND AT THEM UPCOMING LIVE TELEVISED SHOW'S MONDAY NIGHT RAW SMACKDOWNLIVE SENSE BEING SERVED THE ATTACH EXHIBIT(A) PAGE 1-6 ON JULY 12,2018.

CONCLUSION.

PLAINTIFF,DANA W.WILEY ON THIS DAY OF JANUARY 21,2019 HEREBY SEEK'S THE SAID MONETARY RELIEF HERE FROM THE DEFENDANT PURSUANT 28 U.S.C 1915(e)(2) AND 15 U.S.C 1117(A)

(1)COURT ORDER THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO'VINCE MCMAHON JOHN DUE WRESTLING EMPLOYEE'S TO REPLY TO THESE ALLEGATION OF THESE SAID FACTS.

(2)COURT ORDER THE DEFENDANT'S WORLD WRESTLING ENTERTAINMENT CEO'VINCE MCMAHON JOHN DUE D-GENERATION X AND NWO WRESTLING EMPLOYEE'S TO RELEASE A COPY OF PLAINTIFF,DANA W.WILEY COPYRIGHT CONTRACT HERE TO HIM AND THE COURT.

(3)COURT ORDER THE DEFENDANT'S CEO'VINCE MCMAHON JOHN DUE D-GENERATION X AND NWO WRESTLING EMPLOYEE'S TO ROYALTY PAY PLAINTIFF,DANA W.WILEY NO MORE THEN \$75-MILLION HERE FOR HIS BRAND TRADEMARK NAME D-GENERATION X AND NWO MERCHANDISE OR

(4)THE DEFENDANT'S CEO VINCE MCMAHON JOHN DUE D-GENERATION X NWO WRESTLING EMPLOYEE'S SUBMIT A SETTLEMENT CONTRACT HRER TO THIS COURT CONFIRMING THAT THEY WILL PUSCHASE PLAINTIFF,DANA W.WILEY BRAND TRADEMARK NAME D-GENERATION X AND NWO MERCHANDISE FROM PLAINTIFF,DANA W.WILEY FOR SUM OF 10-MILLION OR MORE AND

(5)THE DEFENDANT'S WORLD WRESTLING ENTERTAINMET CEO'VINCE MCMAHON JOHN DUE WRESTLING EMPLOYEE'S PAY COST OF THIS ACTION OR ANY OTHER LEGAL FEE'S THIS COURT MY ORDER UPON THE DEFENDANT'S.

AMENDED

THE SAID ALLEGATION ARE HEREBY TRUE AND CORRECT PURSUANT TO THE PROVISION  
WITHIN THE U.S CONSTITUTION LAWS OF PERJURY. THEREFORTH PLAINTIFF,DANA W.WILEY  
SUBMIT'S THIS PRO'SE AMENDED COMPLAINT HERE TO THE CLERK OF COURT HERE FOR  
THE U.S FEDERAL COURT OF WESTERN PENNSYLVANIA.

FIRST CLASS CERTIFIED MAIL  
JANUARY 21 ,2019

DANA W.WILEY, PLAINTIFF  
531 CASE STREET APT-9  
ROCHESTER, PA 15074  
CELL PHONE(724)558-7679

*Dana Wiley*

WORLD WRESTLING ENTERTAINMENT  
CEO'VINCE MCMAHON JOHN DUE  
WRESTLING EMPLOYEE'S  
1241 EAST MAIN STREET  
STAMFORD, CT 06902  
PHONE NUMBER(203)352-8600